

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

In re	§	
	§	
PASO DEL NORTE MATERIALS, LLC,	§	Case No. 23-30252-HCM-11
	§	
Debtor.	§	

**DEBTOR-IN-POSSESSION'S EXHIBIT AND WITNESS LISTS FOR HEARING
ON MOTION OF 1ST SOURCE BANK FOR RELIEF FROM THE AUTOMATIC STAY,
OR ALTERNATIVELY, FOR ADEQUATE PROTECTION AND WAIVER OF 30-DAY
REQUIREMENT**

EXHIBITS			
EXHIBIT NUMBER	DESCRIPTION	O F F E R E D	O B J E C T I O N
1.	UCC Financing Statement Amendment, March 20, 2018		
2.	UCC Financing Statement Amendment, January 17, 2019		
3.	UCC Financing Statement, August 14, 2020		
4.	UCC Financing Statement, September 23, 2020		
5.	UCC Financing Statement, December 18, 2020		
6.	UCC Financing Statement, January 26, 2021		
7.	UCC Financing Statement Amendment, January 12, 2022		
8.	UCC Financing Statement, May 27, 2021		
9.	UCC Financing Statement, July 26, 2021		
10.	Title Certificate for 2008 Kenworth Mixer Truck VIDN 4011		
11.	Title Certificate for 2008 Kenworth Mixer Truck VIDN 2744		

12.	Photos of the Asphalt Plant			
13.	Photos of the Stansteal Drum			
14.	Photos of the Seven Remaining 4-Axle Ranco End-Dump Trailers.			
15.	Photos of the Ranco 27' End-Dump Trailer.			
16.	Photos of the RBT Chain Conveyer.			
17.	Photos of the Tesab Impact Crusher			
18.	Photos of JLG 12-55A Forklift			
19.	Photos of Genie GTH 844			
20.	Photos of 2013 John Deere 310EP			
21.	Photos of 2013 Dynapac CC624 HF			

WITNESS LIST		
Witness Number	Witness Name	Nature of Testimony
1.	SEAN KELLEY	He has been employed as the expert witness for the Debtor on equipment values. He is expected to testify that the Debtor has substantial equity in the collateral.
2.	JOE A. ROSALES, JR	He is expected to testify that the collateral is well-maintained and the loans are pre-paid ahead of their model amortizations.

Respectfully submitted this 27th day of June, 2023.

/s/



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Attorney for the Debtor-in-Possession

CERTIFICATE OF SERVICE

I do hereby certify that on the 27th day of June, 2023, I did cause a copy of the foregoing Exhibit And Witness Lists For Hearing On U.S. Fire Insurance Company's Motion For Relief From Stay to be over-night mailed to Ronda Farrar, Courtroom Deputy, U.S. Bankruptcy Court, 903 San Jacinto Blvd., Ste. #322, Austin, TX 78701; and to be emailed to 1st Source Bank, c/o Jarom J. Yates, Jarom.Yates@haynesboone.com.

/s/



E.P. BUD KIRK